

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey corporation, d/b/a “My Forex Funds”;
Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi,

Defendants.

Case No.: 3:23-cv-11808

**STIPULATION FURTHER EXTENDING
STATUTORY RESTRAINING ORDER
AND ADJOURNING PRELIMINARY
INJUNCTION HEARING**

WHEREAS, on August 29, 2023, the Court entered a Statutory Restraining Order with an expiration of September 12, 2023. (Dkt. 13);

WHEREAS on September 7, 2023, in response to a joint motion of the parties (Dkt. 25) and finding good cause, the Court extended the Statutory Restraining Order expiration date to September 26, 2023 and continued the preliminary injunction hearing to September 19, 2023, (Dkt. 26);

WHEREAS on September 15, 2023, in response to a joint motion of the parties (Dkt. 36) and finding good cause, the Court further extended the Statutory Restraining Order expiration date to October 13, 2023 and continued the preliminary injunction hearing to October 11, 2023 (Dkt. 37);

WHEREAS pursuant to Federal Rule of Civil Procedure 65(b)(2), a court has authority, “for good cause,” to extend the expiration of a restraining order if the parties so consent. Fed. R. Civ. P. 65(b)(2);

WHEREAS the parties agree that extending the Statutory Restraining Order (Dkt. 13) further, so that it expires on **November 8, 2023**, or until such further order of the Court and continuing the preliminary injunction hearing to **November 6, 2023 at 11:00 a.m. Eastern**, will allow counsel for the parties to continue discussions and determine whether they can reach an agreement on the CFTC's request for a preliminary injunction (Dkt. 7) without the need for a preliminary injunction hearing; and

WHEREAS in the event there is a need for a preliminary injunction hearing, extending the Statutory Restraining Order and continuing the preliminary injunction hearing date will give the parties additional time to prepare for the hearing and give the Court time to review any additional pleadings or evidence the parties may file related to that hearing.

Accordingly, it is hereby stipulated by the parties through their undersigned counsel that a request is hereby made to the Court that:

1. The Court extend the Statutory Restraining Order (Dkt. 13) further, so that it expires on **November 8, 2023**, or until such further order of the Court;
2. The preliminary injunction hearing currently scheduled for October 11, 2023 is continued to **November 6, 2023, at 11:00 a.m. Eastern**;
3. Defendants' briefing on the Motion for Preliminary Injunction shall be filed by no later than **October 31, 2023**;
4. Plaintiff's briefing on the Motion for Preliminary Injunction shall be filed by no later than **November 3, 2023 at noon Eastern**; and
5. This stipulation may be signed in counterparts; and facsimile, photocopy, or electronic pdfs of the signatures below are hereby deemed the equivalent of originals.

Pursuant to Local Rule 12(c), the submitting attorney certifies that each of the

signatories below has expressly agreed to the form and substance of this document and has authorized the filing attorney to submit the document electronically.

Respectfully Submitted,

October 5, 2023

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

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October 5, 2023

**COMMODITY FUTURES TRADING
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